

LOUISIANA PUBLIC SERVICE COMMISSION

DOCKET NO. R-31106

LOUISIANA PUBLIC SERVICE COMMISSION,  
EX PARTE

2016 APR -1 PM 4:01  
LA PUBLIC SERVICE  
COMMISSION

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*In re: Rulemaking to study the possible development of financial incentives for the promotion of energy efficiency by jurisdictional electric and natural gas utilities*

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**COMMENTS OF LPSC STAFF**

The Staff of the Louisiana Public Service Commission ("LPSC" or "Commission") (hereinafter "Staff") respectfully submits these comments in accordance with the schedule set forth in § IX (7) of the Energy Efficiency ("EE") Rules found in the LPSC General Order dated September 20, 2013 ("EE Rules"). These comments specifically address the Plan Year 1 ("PY1") Annual Quick Start Energy Efficiency Program Reports ("annual reports") filed on behalf of Entergy Gulf States Louisiana, LLC ("EGSL"), Entergy Louisiana, LLC ("ELL") (collectively "Entergy" or "the Entergy Companies"<sup>1</sup>), Cleco Power LLC ("Cleco"), and Southwestern Electric Power Company ("SWEPCO"), which reports were submitted by each utility on March 1, 2016.<sup>2</sup> In accordance with § VII of the EE Rules, Staff performed a limited review of the annual reports to ensure compliance with the rules. Based on this review, Staff concludes that the annual reports reasonably comply with the Commission's guidelines, and makes a few recommendations for the PY2 annual reports, as further explained herein. Staff reserves its right to supplement or modify these comments as necessary.

**BACKGROUND**

This docket was initiated in August 2009 to determine whether or not an energy efficiency ("EE") requirement for electric and natural gas utilities subject to the jurisdiction of the Louisiana Public Service Commission ("LPSC" or "the Commission") was in the public

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<sup>1</sup> For purposes of this report, Staff will employ the acronym EGSL for Entergy Gulf States Louisiana and ELL for Entergy Louisiana. Also, although the two Entergy Companies were combined into a single company effective October 1, 2015, the Quick Start program began prior to the business combination of the two companies, and therefore, budgets, costs, results, and reporting have been and will continue to be provided separately for the two companies throughout the conclusion of the Quick Start phase.

<sup>2</sup> For purposes of this report, "Companies" or "Utilities" refers to all four of the Louisiana jurisdictional investor-owned electric utilities.

interest. With the assistance of parties participating in this rulemaking, Staff developed a set of EE rules appropriate for LPSC-jurisdictional utilities that were approved by the Commission on September 20, 2013. The resulting EE rules include a phased implementation approach. The first is a "Quick Start" phase, in which the utilities have been actively implementing an initial set of EE programs, and the second is a collaborative phase intended to result in long-term rules that would ultimately be used to implement a comprehensive set of programs, should the Commission approve such programs. The Commission's goal in implementing the Quick Start process was to encourage utility companies and their customers to make efficient use of energy and thereby realize bill savings by introducing an initial set of energy efficiency programs that could be designed and implemented quickly and economically. The rules require each of the utilities' Quick Start EE portfolios to include programs that strike the appropriate balance between producing net quantifiable benefits and developing the energy efficiency infrastructure in Louisiana that would promote energy efficiency over the long-term.

After the Commission approved the EE Order in September 2013, the Companies began working to design EE programs that would meet the Commission's goals and requirements. The Companies made EE Quick Start Plan and EE Cost Rate Rider filings between June and July of 2014, which discussed the type of EE programs that each intended to implement, the budgets that would be spent, the energy savings benefits expected, and the rates and costs that would be recovered. Updates were filed by each Company up to the start of implementation. Also, detailed Evaluation, Measurement, and Verification ("EM&V") plans were filed in September 2014. Implementation of Quick Start plans was originally set to begin October 1, 2014; however, a one month delay was approved at Staff's request in order to allow time to review all required information, including detailed EM&V plans, and the Companies' Lost Contribution to Fixed Cost ("LCFC") calculation formula proposal. On October 9, 2014, Staff filed its Notice of Completion of its Review, and established that the start date for implementation would be November 1, 2014.

Over the course of PY1, the participating utilities have been implementing various EE programs directed towards all retail classes, including residential, commercial and industrial customers. With the completion of PY1 on October 31, 2015, the participating utilities have filed detailed annual reports, which provide information that describe the programs implemented

and results achieved, and comprehensively discuss such things as participation and training, staffing levels, marketing efforts, survey results, best practices, EM&V results, recommendations for improvements, and planned or proposed changes to programs and budgets for PY2. Specific requirements for the annual report filings are set forth in § X of the EE Rules, and include:

- Annual energy savings (in MWh) for electric utilities.
- Lifetime savings (in MWh) for electric utilities.
- Annual load reduction (in kW) for electric utilities.
- Annual program cost, broken out by (a) administration and planning, (b) promotion and advertising, (c) customer incentives, (d) delivery and vendors, (e) participant contributions, and (f) monitoring and verification.
- Annual and cumulative present value of benefits, annual and cumulative present value of costs, annual and cumulative present value of net benefits, and benefit cost ratios, using at least the Total Resource Cost test and the Utility Cost test.
- Program participation rates. Participation can be defined in terms of households served, businesses served, measures installed, or other unit that is appropriate for the nature of the program.
- Implementation issues, such as barriers against increased participation.
- Recommendations to improve the programs.
- Efforts by the utility to staff and train employees regarding the development and implementation of EE programs and infrastructure (such as the development of trade allies in the utilities' regions).

In addition, § X requires that each annual report include comparisons of the information above with the same information from the Quick Start plan projections that were made prior to when implementation first began. Furthermore, § X also requires utilities to provide a detailed explanation of each EM&V evaluation used for each EE program as well as all assumptions, work papers, supporting documentation, and spreadsheets used in the EM&V calculations.

In addition to the annual reports, each Company filed revised rate riders at the end of PY1 pursuant to requirements in the EE Order at § IX (6), in which the Companies determined whether revenues collected matched costs incurred, including the LCFC costs, and developed new rates based on budget projections that had been filed prior to the start of the Quick Start EE

programs in 2014. The new rates include a true-up of the over or under-collected costs that had occurred in PY1.

## **REVIEW OF ANNUAL REPORTS**

The Companies were guided by the fact that § V of the rules allows the use of third party administrators (“TPA”) and third party evaluators (“TPE”). The rules state:

Utilities may hire one or more independent third party administrators and/or contractors as appropriate to handle administration of the quick start energy efficiency programs and conduct their EM&V studies. While the Commission does not mandate that third party contractors must be hired, doing so could help ensure that the studies are unbiased and conform to industry best practices. Several utilities could even collaborate to hire a single contractor, or set of contractors, to promote statewide consistency and administrative efficiency.  
(Footnote omitted)

For the Quick Start Program, the Companies all hired the same TPA, CLEAResult, and the same TPE, ADM Associates, Inc. CLEAResult is headquartered in Austin, Texas, and has offices in more than 80 cities in the U.S. and Canada. CLEAResult’s website indicates that it designs, markets and implements energy efficiency programs around the world. ADM Associates, Inc.’s main office is in Sacramento California, and it states that it has provided energy efficiency program evaluation services and conducts research for utilities and other clients across North America. ADM Associates, Inc.’s website states that it offers evaluation expertise in establishing evaluation frameworks and guidelines, developing evaluation plans, establishing M&V and due diligence procedures for implementers, reviewing tracking systems, program theories, and program communications, conducting evaluations of program impacts, and reporting evaluation status and results. The use of the same TPA and TPE by each utility for the Quick Start program has provided value in that similar programs were developed for each of the utilities in Louisiana, and information and best practices have been shared between the utilities. Use of the same TPA and TPE has also provided value in that the utilities were able to provide uniform annual reports that contained similar kinds of information, which made review of their annual reports easier. A further useful feature of the TPA’s and TPE’s collaboration with the utilities is that all of the utilities used similar software tools. For example, participating contractors in each of the Companies’ programs utilized a tablet-based software program that

CLEAResult developed named *Open* to verify customer eligibility, track project installations, help with walkthrough energy efficiency assessments, and submit incentive paperwork.<sup>3</sup> In addition, all of the Companies used a standardized reporting software package for reporting results of their PY1 results. This software is known as the Arkansas Public Service Commission Standardized Annual Report Packet (“SARP”), and again, its use made Staff’s evaluation of each of the Companies’ reports easier to perform. Staff recommends that use of the SARP system should be continued for use in future annual reports.

Each of the Companies had similar programs in their portfolios of EE programs, yet the details associated with the programs differed, in some cases greatly. The following are the lists of programs that each company offered during PY1:

<b>Cleco</b>	<b>SWEPCO</b>	<b>ELL &amp; EGSL</b>
Residential Solutions	Residential Solutions	Residential Solutions
Residential Appl Recycling	Income Qualified	Lighting and Appliances
Small Business Direct Install	Residential Programs	Income Qualified
Schools/Cities	Small Business Direct	CoolSaver AC and HVAC
Commercial and Industrial	Large Comm Solutions	Small Business
		Large C&I
		Commercial Market Dev
		Residential Market Dev

The participating utilities discussed these programs in detail in their annual reports, and Staff provided summaries of these programs in the last set of comments it filed in July and August 2014. Each of the annual reports included a narrative overview discussing the programs, activities performed, kWh savings, participation rates, staffing levels, and training. Also included in the reports were marketing materials that were created in connection with the programs, a detailed report written by the TPE covering the EM&V process and results, and marketing materials that were used to promote the programs to customers. As mentioned, a

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<sup>3</sup> The Annual Reports noted there were a few issues with the software, and the TPE made recommendations that would help improve the software for future use. Also, though it was not explained why, it appears that contractors in SWEPCO’s service territory experienced greater problems using the software for residential programs than contractors in the other service territories, and ultimately the SWEPCO contractors discontinued using the software and relied on worksheets that they were provided. SWEPCO’s annual report mentioned that the software is being examined for possible modification in the forthcoming year.

standardized spreadsheet (SARP workbook) was supplied by each company, containing details concerning the program budget, costs, savings and cost-benefit analysis.

The reports note that during the course of PY1, customer awareness of the EE programs increased due to outreach efforts including the use of a program website and marketing materials. Some programs ramped up very quickly, in fact. For example, Entergy noted that the energy assessments and direct-install measures in its Residential Solutions program reached its budget allocation maximum limits very early in the program year (March 2015), and had to be discontinued. The other utilities reported similar results with their energy assessments.

Contractors were used as the primary method of delivering services to customers, and participating contractors were trained and developed throughout the service area. Contractors were trained to Building Performance Institute (“BPI”) standards, and to provide services, contractors had to hold certifications such as BPI accreditation. Cleco particularly noted that its program was successful in encouraging contractors who normally worked in the larger metropolitan areas to offer EE services to the smaller, more rural communities that are prevalent in Cleco’s service territory. Contractors in Louisiana experienced positive employment impacts as a result of the Quick Start program. Based on contractor interviews that it conducted, the TPE noted the following in each of the Companies’ annual reports:

*In addition to changes in the services provided, two respondents said that participation in the program has led them to increase their staffing by two to three full-time employees. Two other trade allies reported that to meet the needs to deliver the program services, they have hired between 10 and 12 full-time employees. One of these respondents also indicated that their firm opened a new office location in Louisiana.*

In addition to residential programs, all of the participating utilities offered small business programs (less than 100 kW), and Entergy and SWEPCO offered large commercial and industrial customer EE programs (over 100 kW). These programs were designed to help customers overcome the barrier of paying initial “first” costs to implement energy efficiency measures, and helped promote awareness of energy savings benefits. In some of the programs, incentive funds were reserved early in the PY1, and customers had to be placed in a queue for PY2 funds. Entergy’s annual report included case studies that were developed to broaden market acceptance and to increase understanding of program offerings. In the case of its large



commercial and industrial program, SWEPCO stated that one means of promoting the program was through use of its customer service representatives to reach out to its customers, which had the added benefit of helping to develop closer relationships with customers, and led to greater levels of customer satisfaction. In fact, surveys were conducted of customers in all of the participating utilities' programs, which found the EE programs led to enhanced customer satisfaction due to the interaction with the utilities, their contractors and consultants.

The detailed reports that the TPE included in each of the participating utilities' annual reports discussed the Companies' EE programs, and the EM&V process that the TPE performed. The TPE's report provided program descriptions, summaries of the EE measures and expected savings prior to the start of PY1, savings and calculations methodologies, energy and demand savings that the TPE verified occurred, reviews of program processes, results of interviews conducted, including staff, contractors, and customers, and recommendations for improvements that the TPE identified.

In the Executive Summary for EGSL, as an example, the TPE stated that the goals of the EM&V effort for PY1 were as follows:

- *For prescriptive measures, verify that savings are being calculated according to the appropriate Arkansas TRM V3.0 guidelines, adapted for Louisiana weather.*
- *For custom measures, this effort comprises the calculation of savings according to accepted protocols (such as International Performance Measurement and Verification Protocol, "IPMVP"). This is to ensure that custom measures are cost effective and provide reliable savings.*
- *Conduct process evaluation of all EGSL programs and of the portfolio overall. This is to provide a comprehensive review of program operations, marketing and outreach, quality control procedures, and program successes relative to goals. From this, the Evaluators are to provide program and portfolio-level recommendations for EGSL. Process evaluation activities include interviews of key program actors, surveys of participants and non-participants, literature reviews and best-practices assessments, and documentation of program activities, successes, and shortcomings.*

It should be noted that during the course of PY1, and for PY2, the Companies made changes to some of the programs. For example, each Company's Residential Solutions program offered customers cash incentives to have a trade ally conduct an energy efficiency survey at their homes. During the visit, the trade ally would both offer to install a limited number of

energy efficiency measures while on-site, such as high efficiency compact fluorescent bulbs (“CFL”), and identify other projects that could be performed at discounted prices that would lead to energy savings in the homes. Additional incentives would then become available for those projects, such as ceiling insulation, duct sealing, and air infiltration reduction.

During the course of PY1, changes were made to the Quick Start programs to improve the results that could be achieved. For example, all three companies discontinued offering cash incentives to perform on-site energy efficiency surveys. They believed that even without the incentives, sufficient numbers of customers would still request the TPA to perform energy efficiency surveys. As a result, the money saved from those incentives was redirected to be spent on other energy efficiency measures, without a concern that the outcome of the Residential Solutions program would be affected. Another example of a change that was made to improve results is a decision that Cleco made. It was the only company to offer an appliance recycling program, however, the program produced disappointing results, and Cleco’s trade ally, Jaco Environmental, suffered financial hardship during PY1. As a result, Cleco decided to discontinue that program and re-direct its budget to other energy efficiency measures. The TPA and TPE identified other recommendations for improvements that Staff believes should be given serious consideration as PY2 progresses, and the utilities should make every effort to adopt the recommendations they believe will improve the performance of their EE programs.

## **EE PROGRAM RESULTS**

Appendix 1 contains a table that was developed from information included in each of the Company’s PY1 Annual Reports, which compares the performance of each Company’s EE programs based on the TPE’s measurement and verification activities. The table compares budgeted and realized (actually incurred) program results between the Companies, including utility implementation costs, energy savings, and peak demand savings. In addition, the column “kWh per \$ saved” is a metric Staff included to compare how successful the programs were at producing energy savings based on the budget spent to implement the programs. This calculation was performed based on both budgeted projected results, and actual achieved results determined for PY1. The greater the value, the more effective the program was at turning costs into energy savings.



For purposes of creating a more concise table, all residential customer programs were grouped together and reported as Residential Programs. The data in each of the “budget” columns came from original budget estimates that the Companies’ filed with the Commission prior to the start of PY1. The “realized” columns contain results that the TPE verified had occurred during the course of PY1.

Program cost budgets were established prior to the start of PY1. The Utility Cost budget incorporated all categories of costs required to implement the programs, including administrative and planning, promotion and advertising, delivery and vendors, EM&V, and incentives. Incentive payments made up approximately 40 – 50% of all costs spent implementing the programs. As the results in the table indicate, the Companies managed their programs either within, or very close to the initial cost budgets that were established prior to the start of PY1. SWEPCO’s actual implementation budget (\$1,995 M), slightly exceeded its PY1 implementation budget (\$1,925 M), yet it remained well under .50% of its 2012 retail revenues. In fact, SWEPCO’s actual implementation cost was just .41% of its 2012 retail revenues of \$481.555 million.<sup>4</sup>

The Commission’s EE Order permitted the Companies to recover costs incurred in operating their EE programs through EE Riders that were established prior to the start of PY1. In addition to being able to recover implementation costs (administrative and planning, promotion and advertising, delivery and vendors, EM&V, and incentives), subject to the expenditure cap, the Companies were also allowed to recover lost revenues, also known as lost contribution to fixed costs (“LCFC”) as part of their EE riders.<sup>5</sup> The mechanism used to determine LCFC was contained in a joint filing that the parties made July 14, 2014, prior to the start of the Quick Start program. The Commission’s EE Order allows the Companies to revise their EE Riders at the end of the plan year, to be in effect for the next year, which the Companies have all done in filings they made to the Commission in February 2016. The Rider adjustment for PY2 accounts for any under-recovered or over-

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<sup>4</sup> Note that § VI. of the Commission’s EE Order imposes a requirement that the utilities not spend more than .50% of their 2012 retail revenues on implementation costs.

<sup>5</sup> At the time the Quick Start rule was developed, the Companies were concerned about the decrease in revenue that would result from implementing EE programs, due to the decrease in energy consumption that EE programs cause. The Companies were concerned that this reduction in revenues would make it harder for them to meet their fixed cost obligations. In order to alleviate these concerns, the Commission allowed the Companies to recover lost revenues.

recovered costs (both implementation costs and LCFC costs) from PY1 and trues-up those costs to be recovered in the rate charged during PY2. The Companies' derived their new PY2 riders based on PY2 implementation budgets that they had projected and filed with the Commission prior to the start of the EE programs in November 2014 (i.e. prior to PY1).

It is important to note that in accordance with § VIII of the Commission's EE Rules, at the end of the Quick Start Process Staff will conduct a review and audit of all of the costs that have been recovered, both implementation costs and LCFC, to determine whether costs passed and rates charged through the EE Rider were reasonable and prudent, and appropriate for recovery in the EE Rider mechanism consistent with these rules. Staff reminds the Companies that § VIII places the burden of proof on the utility to show that the costs passed through its EE Rate Rider were prudently incurred, and were eligible for recovery through the EE Rate Rider. It also requires that each utility maintain the records to support its costs and rates, which at a minimum, include the implementation costs, the derivation of the LCFC costs, and the rate computation. Additional discussion of LCFC costs will be provided below after a review of the energy and peak demand savings results that occurred in PY1.

Along with program cost budgets, energy and peak demand projections were developed and reported in each of the Companies' Program Plan reports that were filed prior to the start of the Quick Start program in PY1. The energy and peak demand savings represent the amount of savings benefits that the Companies expected to achieve as a result of the energy efficiency measures implemented in the programs. One of the primary responsibilities of the TPE is to verify that the savings the Companies derived were accurate. This is important because cost effectiveness of the programs is based on the verified energy savings, and LCFC cost recovery is also based on the verified energy savings. It is considered a positive aspect of the program if the verified actual energy savings turned out to be higher than were projected prior to the start of the program, particularly if the Companies were able to manage their programs within or close to the cost budget they established prior to the start of PY1, which the table in Appendix 1 indeed shows that occurred. It goes hand-in-hand that with greater energy savings and more cost effective programs, the Companies will incur greater lost revenues, and therefore, additional amounts will be recovered for LCFC.

As the results in the table in Appendix 1 indicate, the Companies all realized greater energy savings than they had projected prior to the start of implementation of the programs. SWEPCO and Entergy exceeded their projections for their entire portfolios of EE programs by between 13 and 18%, and Cleco exceeded its target for its entire portfolio by 35%. It is not entirely clear why Cleco's energy savings results were so high compared to its targets, relative to the other Companies, but it could be surmised that there could have been differences in the programs offered, contractor training, incentives offered, marketing efforts, etc, that could have accounted for the differences in the energy savings results. Staff recommends that Cleco and the TPE review these results once again to ensure they are reasonable and accurate. Furthermore, in future annual reports, Staff recommends that since the same TPA and TPE are operating and evaluating the programs for each Company, a greater level of emphasis should be placed on examining and explaining this kind of difference in results between the Companies. This could ultimately lead to a greater use of best practices to improve the EE programs.

The peak savings results in table 1 indicate that none of the Companies realized the level of peak demand savings that they had projected prior to the start of the Quick Start program. Staff recommends that additional evaluation should be performed by the utilities to determine why all of the portfolios exceeded energy savings targets while falling below peak demand savings targets. Again, Staff believes this could result in useful information that the utilities could rely on to improve the EE programs.

The first year kWh saved per \$ spent metric in table 1 provides an indication of the amount of energy savings, either projected or actually achieved, for every dollar spent on the various programs. The results, including both budgeted and realized results, range from about 2.8 kWh to 6.0 kWh per dollar spent.<sup>6</sup> All of the companies achieved greater levels of actual energy savings than targeted at the start of the program. Even with LCFC included in the calculation, the actual energy savings per dollar spent still exceeded the projected results. It appears that Cleco achieved the greatest amounts of energy savings for each dollar spent, followed by the Entergy companies, and then SWEPCO. Staff recommends that this metric be considered further by the Companies and their contractors to determine if

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<sup>6</sup> It should be clear that this metric only accounts for energy savings that have been verified in the first year. In other words, while one-time costs were spent during PY1, energy savings are expected to continue in future years.

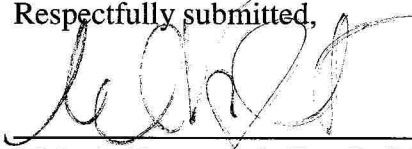
any best practice improvements can be made to the EE programs for the remaining program years.

As mentioned previously, the actual verified energy savings have increased for each company compared to the projections performed prior to PY1. As such, the LCFC cost recovery will also be greater than originally projected. The table in Appendix 1 compares the budget to actual LCFC costs. Since Cleco had the greatest increase in the amount of energy savings compared to budget, its LCFC cost increased the most compared to the other companies. Also, since each Company achieved greater actual energy savings than originally budgeted, and since each Company spent close to what had been budgeted to implement their programs, the Companies were able to achieve even better TRC cost effectiveness results than had been projected prior to the start of PY1. Appendix 2 below compares each Company's actual realized TRC results to budgeted results that were filed with the Commission prior to PY1.

## CONCLUSIONS

Based on the limited review conducted, Staff believes the Companies have reasonably complied with the Commission's guidelines for implementing EE programs, and have satisfied the Commission's requirements for providing information as part of their annual report filings. Staff understands that the Companies have already begun implementing their EE programs for PY2, though Staff requests that the Companies carefully review Staff's recommendations found in these comments for possible improvements that could be made as the Companies continue implementing their programs.

Respectfully submitted,



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# Appendix 1

## Louisiana Jurisdictional Electric Investor Owned Utility First Plan Year Energy Efficiency Results November 1, 2014 - October 31, 2015

	Utility Cost			Energy Savings			Peak Reduction			1st Year kWh saved per \$ spent		
	Budget (\$000)	Realized (\$000)	% of Budget	Budget (kWh)	Realized (kWh)	% of Budget	Budget (kW)	Realized (kW)	% of Budget	Budget kWh / \$	Realized kWh / \$	% of Budget
<b>Cleco</b>												
Residential Programs	\$1,948	\$1,862	96%	5,606,189	9,404,613	168%	1,537	1,763	115%	2.88	5.05	175%
Small Business Direct Install	\$470	\$450	96%	1,756,105	1,672,761	95%	409	278	68%	3.74	3.72	99%
Schools/Cities	\$345	\$169	49%	1,466,008	715,818	49%	321	152	47%	4.25	4.24	100%
Commercial and Industrial	\$570	\$710	125%	2,491,391	3,492,474	140%	646	204	32%	4.37	4.92	112%
Implementation Budget	\$3,333	\$3,191	96%	11,319,693	15,285,666	135%	2,913	2,397	82%	3.40	4.79	141%
LCFC	\$513	\$777	151%									
Total	\$3,846	\$3,968	103%	11,319,693	15,285,666	135%	2,913	2,397	82%	2.94	3.85	131%
<b>SWEPSCO</b>												
Residential Programs	\$1,028	\$1,120	109%	2,839,135	2,953,195	104%	808	740	92%	2.76	2.64	95%
Small Business Direct Install	\$390	\$384	98%	1,209,420	1,246,605	103%	310	316	102%	3.10	3.25	105%
Large Commercial Solutions	\$506	\$490	97%	2,004,691	2,929,459	146%	522	288	55%	3.96	5.97	151%
Implementation Budget	\$1,925	\$1,995	104%	6,053,246	7,129,259	118%	1,640	1,344	82%	3.15	3.57	114%
LCFC	\$201	\$250	125%									
Total	\$2,126	\$2,245	106%	6,053,246	7,129,259	118%	1,640	1,344	82%	2.85	3.18	112%
<b>EGSL</b>												
Residential Programs	\$1,217	\$1,099	90%	4,040,495	5,254,818	130%	1,126	1,211	108%	3.32	4.78	144%
Small Business	\$359	\$324	90%	1,275,097	1,208,021	95%	243	209	86%	3.55	3.73	105%
Large C&I	\$741	\$676	91%	3,355,991	3,726,767	111%	733	551	75%	4.53	5.52	122%
Res and Comm Market Dev	\$177	\$161	91%									
Implementation Budget	\$2,494	\$2,260	91%	8,671,583	10,189,606	118%	2,102	1,971	94%	3.48	4.51	130%
LCFC	\$346	\$422	122%									
Total	\$2,840	\$2,682	94%	8,671,583	10,189,606	118%	2,102	1,971	94%	3.05	3.80	124%
<b>ELL</b>												
Residential Programs	\$2,049	\$1,872	91%	7,095,486	8,571,638	121%	2,007	1,945	97%	3.46	4.58	132%
Small Business	\$515	\$467	91%	1,793,523	1,667,792	93%	316	283	90%	3.48	3.57	103%
Large C&I	\$1,067	\$963	90%	4,987,003	5,381,724	108%	952	762	80%	4.67	5.59	120%
Res and Comm Market Dev	\$281	\$256	91%									
Implementation Budget	\$3,913	\$3,558	91%	13,876,012	15,621,154	113%	3,275	2,990	91%	3.55	4.39	124%
LCFC	\$626	\$734	117%									
Total	\$4,539	\$4,292	95%	13,876,012	15,621,154	113%	3,275	2,990	91%	3.06	3.64	119%

## Appendix 2

### PY1 TRC RESULTS November 1, 2014 - October 31, 2015

	TRC Budget	TRC Realized
<b>Cleco</b>		
Residential Programs <sup>1</sup>	1.09	1.78
Small Business Direct Install	1.36	1.64
Schools/Cities	1.08	1.53
Commercial and Industrial	1.31	1.81
Total	1.15	1.76
<b>SWEPCO</b>		
Residential Programs	1.45	1.99
Small Business Direct Install	1.60	2.18
Large Commercial Solutions	1.55	1.80
Total	1.51	1.96
<b>EGSL</b>		
Residential Programs	1.32	1.53
Small Business	1.22	1.95
Large C&I	1.22	2.25
Total	1.20	1.77
<b>ELL</b>		
Residential Programs	1.42	1.75
Small Business	1.18	1.94
Large C&I	1.22	2.32
Total	1.25	1.93

**Notes:**

<sup>1</sup> Individual residential programs not shown are all grouped together and called Residential Programs.



**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the above Comments on behalf of the Louisiana Public Service Commission has been served upon all counsel of record by email this 1<sup>st</sup> day of April, 2016.

  
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Melanie A. Verzwylt

**Service List for R-31106  
as of 4/1/2016**

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